

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE KINGREY, and SANDRA McCOLLUM, individually and as heirs at law in the Estate of LARRY GENE McCOLLUM, Plaintiffs,

VS.

CIVIL ACTION NO.

3:12-cv-02037

BRAD LIVINGSTON, JEFF PRINGLE, :
RICHARD CLARK, KAREN TATE, :
SANDREA SANDERS, ROBERT EASON, :
THE UNIVERSITY OF TEXAS :
MEDICAL BRANCH and the TEXAS :
DEPARTMENT OF CRIMINAL JUSTICE, :
Defendants. :

ORAL AND VIDEOTAPED DEPOSITION OF
THE DESIGNATED REPRESENTATIVE OF
THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH
GLENDA ADAMS, M.D.

NOVEMBER 19, 2013

ORAL AND VIDEOTAPED DEPOSITION OF THE DESIGNATED REPRESENTATIVE OF THE UNIVERSITY OF TEXAS MEDICAL BRANCH BY AND THROUGH GLENDA ADAMS, M.D., produced as a witness at the instance of the Plaintiffs, and duly sworn, was taken in the above-styled and numbered cause on Tuesday, November 19, 2013, from 11:11 a.m. to 6:03 p.m., before Mary C. Dopico, Certified Shorthand Reporter No. 463 and Notary Public in and for the State of Texas, reported by machine shorthand and audio/video recording at the offices of Rebecca Sealy Hospital, 404 8th Street, Room, 4.204, Galveston, Houston, Texas, pursuant to Notice and the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

1 MS. COOGAN: You filed a motion -- You
2 filed this, you served this, I filed objections. You
3 find a motion to compel. The Court granted your motion
4 to compel except for with regard to 23, 24, 25. She
5 granted my objections on the basis that this witness is
6 here to testify about the things on this list except 23,
7 24 and 25.

8 MR. EDWARDS: Okay. Well, if you're --

9 MS. COOGAN: Hang on. Let me just make
10 my record.

11 She's not here to testify as an expert on
12 the effects of these medical conditions. That's not why
13 she's here, and so she won't be doing that.

14 MR. EDWARDS: Okay. Well, I just asked
15 if you have a copy of the order, since we're in the UTMB
16 law department. I'd appreciate seeing it just to --
17 just to verify that. But if --

18 MS. COOGAN: Maybe your office can fax
19 you a copy. I don't have a copy with me.

20 MR. EDWARDS: Again, I mean -- Okay. If
21 you're -- Okay. That's fine.

22 MS. COOGAN: Or if somebody else has one,
23 or maybe we can get one at the break or whatever, but...

24 MR. EDWARDS: I'm just asking.

25 MS. COOGAN: Okay.

WRIGHT WATSON & ASSOCIATES

(800) 375-4363 3307 Northland Dr., Ste. 185 Austin, TX 78731-4946 (512) 474-4363
ed4af7ad-12d7-431a-9322-dd8468e9e55c

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

Go ahead.

A. The autopsy report states that he died of hyperthermia.

Q. (By Mr. Edwards) What is that?

A. Generally the definition of "hyperthermia" requires a body temperature -- different definitions give different ones -- somewhere between 103 and 105 degrees, with neurological deficits. You may have other findings such as DIC.

Q. What do you -- What does UTMB contract hyperthermia? You were the director, right, for medical care?

MS. COOGAN: Objection, she is not here to give you medical opinions, and she's not going to do it pursuant to the Court's order.

Q. (By Mr. Edwards) Well, that's -- that's inaccurate. Okay?

Because the question was: Why did he die?

You said: He died from hyperthermia.

And I'm asking you what you consider hyperthermia to be?

MS. COOGAN: I'm going to ask you not to answer that question.

MR. EDWARDS: You're instructing --

WRIGHT WATSON & ASSOCIATES

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

MS. COOGAN: I'm going to tell you
again --

MR. EDWARDS: -- Dr. Adams not to answer
the question of -- the question of what the definition
of hyperthermia is, according to UTMB?

MS. COOGAN: Let me tell you one more
time. And we can argue about it or we can not argue
about it.

MR. EDWARDS: Okay.

MS. COOGAN: We can go to the Court or we
can not go to the Court.

MR. EDWARDS: Okay.

MS. COOGAN: She is not here in any
capacity to be an expert on medical issues for you. She
is here pursuant to a 30(b)(6) --

MR. EDWARDS: Right.

MS. COOGAN: -- and that's what she's
going to testify about, and all she's going to testify
about.

MR. EDWARDS: Okay.

MS. COOGAN: So you can ask her if you
would like, and I'm going to continue to instruct.

MR. EDWARDS: All right. Well, that's
fine.

Q. (By Mr. Edwards) Why, according to the

WRIGHT WATSON & ASSOCIATES

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

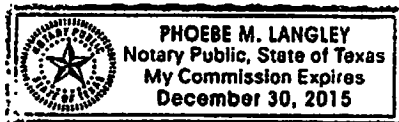
I, GLENDA ADAMS, M.D., have read the foregoing
deposition and hereby affix my signature that same is
true and correct, except as noted above.

Glenda Adams
GLENDA ADAMS, M.D.

THE STATE OF Texas :
COUNTY OF Montgomery :

Before me, Phoebe M Langley,
on this day personally appeared GLENDA ADAMS, M.D.,
known to me or proved to me on the oath of
_____ or through _____
(description of identity card or other document) to be
the person whose name is subscribed to the foregoing
instrument and acknowledged to me that he\she executed
the same for the purpose and consideration therein
expressed.

Given under my hand and seal of office on this
30th day of December, 2013.



Phoebe M. Langley
NOTARY PUBLIC IN AND FOR
THE STATE OF Texas
My Commission Expires: 12-30-15

WRIGHT WATSON & ASSOCIATES

(800) 375-4363 3307 Northland Dr., Ste. 185 Austin, TX 78731-4946 (512) 474-4363
cd4af7ad-12d7-431a-9322-dd8468e9e55c

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN MCCOLLUM, STEPHANIE
KINGREY, and SANDRA MCCOLLUM,
individually and as heirs
at law in the Estate of
LARRY GENE MCCOLLUM,
Plaintiffs,

VS.

CIVIL ACTION NO.

3:12-cv-02037

BRAD LIVINGSTON, JEFF PRINGLE,
RICHARD CLARK, KAREN TATE,
SANDREA SANDERS, ROBERT EASON,
THE UNIVERSITY OF TEXAS
MEDICAL BRANCH and the TEXAS
DEPARTMENT OF CRIMINAL JUSTICE,
Defendants.

REPORTER'S CERTIFICATION
TO THE
ORAL AND VIDEOTAPED DEPOSITION OF
THE DESIGNATED REPRESENTATIVE OF
THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH
GLENDA ADAMS, M.D.
NOVEMBER 19, 2013

I, Mary C. Dopico, Certified Shorthand. Reporter
in and for the State of Texas, do hereby certify that
the facts stated by me in the caption hereto are true;
that the foregoing deposition of THE DESIGNATED
REPRESENTATIVE OF THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH GLENDA ADAMS, M.D., the witness
hereinbefore named, was taken by me in machine
shorthand, the said witness having been by me first duly
cautioned and sworn to tell the truth, the whole truth,
and nothing but the truth, and later transcribed from my
machine shorthand notes to typewritten form by me.

I further certify that the above and foregoing

WRIGHT WATSON & ASSOCIATES

(800) 375-4363 3307 Northland Dr., Ste. 185 Austin, TX 78731-4946 (512) 474-4363
cd4af7ad-12d7-431a-9322-dd8468e9e55c

1 deposition, as set forth in typewriting, is a full, true
2 and correct transcript of the proceedings had at the
time of taking said deposition.

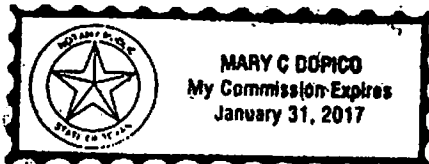
3 I further certify that pursuant to FRCP Rule
4 30(f)(1) that the signature of the deponent was
requested by the deponent or a party before the
5 completion of the deposition and returned within 30 days
from date of receipt of the transcript. If returned,
6 the attached Changes and Signature Pages contain any
changes and the reasons therefor;

7 _____ was not requested by the deponent or a party
8 before the completion of the deposition.

9 I further certify that I am neither attorney or
10 counsel for, nor related to or employed by any of the
parties to the action in which this deposition is taken,
11 and further that I am not a relative or employee of any
attorney or counsel employed by the parties hereto, or
financially interested in the action.

12 I further certify that charges for the preparation
13 of the foregoing completed deposition were \$ 1745.45
for the original thereof, charged to Attorney(s) for
14 Plaintiffs.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE this the 3rd
day of December, 2013.



17 Mary C. Dopico
18 Mary C. Dopico, CSR, RPR, CRR
19 CSR No. 463, Exp. 12-31-2014
Notary Public, State of Texas
Commission Expires 1-31-2017

20 Independent Contractor To:
21 Wright, Watson & Associates
Firm Registration No. 225
Expires 12-31-2013
22 3307 Northland Drive, Suite 185
Austin, Texas 78731
23 512/474-4363 Fax 512/474-8802
24
25